AO 91 (Rev. 11/11) Criminal Complaint

United States Courts
Southern District of Texas
FILED
MAY - 9 2017
David J. Bradley, Clerk of Court

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States of America v. Bhavdip D. SANGHAVI AKA: Bobby	)	Case No. H17-0732M
Defendant(s)		

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 2, 2017 in the county of Harris in the Southern District of Texas, the defendant(s) violated:

Code Section	*Offense Description*
18 USC 1343	On June 12, 2015 and November 20, 2015, Sanghavi was part of a fraudulent scheme to intentionally deprive another of money by claiming the individual owed tax money and had to send it via wire communication.

This criminal complaint is based on these facts:

See Attached Affidavit of U.S. Treasury Inspector General for Tax Administration Special Agent Jessica Cipolla

☑ Continued on the attached sheet.

[signature]
Complainant's signature

Jessica Cipolla, Special Agent
Printed name and title

Sworn to before me and signed in my presence.

Date: 05/09/2017

[signature]
Judge's signature

City and state: Houston, Texas

U.S. Magistrate Judge
Printed name and title

MARY MILLOY
United States Magistrate Judge

I, Jessica Cipolla, Special Agent with the Treasury Inspector General for Tax Administration (TIGTA), being duly sworn state: I make this affidavit with personal knowledge based on my participation in this investigation, including witness interviews by myself and/or other law enforcement agents and information gained through my training and experience. This affidavit does not contain all facts developed during the underlying investigation and is being submitted for the limited purpose of establishing probable cause in support of this criminal complaint.

TIGTA promotes the economy, efficiency, and effectiveness in the administration of the internal revenue laws. It is also committed to the prevention and detection of fraud, waste, and abuse within the Internal Revenue Service (IRS) and related entities. I have been a Special Agent since July 2012 after successfully completing the Criminal Investigator Training Program at the Federal Law Enforcement Training Center. As a TIGTA Special Agent I have received training, participated in, or conducted criminal investigations related to computer fraud, wire fraud, bank fraud, and false impersonation of IRS employees, and other criminal violations within TIGTA's jurisdiction.

On or about June 12, 2015, C.L. of Fort Wayne, IN reported she received a voicemail stating it was the IRS and to avoid having a case filed against her, she needed to call back immediately. She called the phone number back and spoke to a Michael Black, who stated he was an IRS employee. Black told her she had to immediately pay her tax liability or a warrant for her arrest would be issued.

She was instructed to get cash, so she went to her bank and withdrew $2,000. Black directed her to Walmart to wire transfer the cash through Western Union (WU). By Black's instruction, she wired $1,950 to Deborah Peters in Houston, TX. The WU tracking number is xxx-xxx-1019.

TIGTA's Agents met with Peters. Peters reported that she was recruited to work for Vedas Engineer and BHAVDIP (BOBBY) SANGHAVI and the local Workforce Center. Peters was told Engineer and SANGHAVI ran a company that would collect wire transfers from people who needed to pay their taxes. Engineer and SANGHAVI told her she would be responsible for picking up the money. Engineer or SANGHAVI would drive her to various locations throughout the day. She would then exit the vehicle and pick up the cash from the Western Union counter. She would then return to the vehicle and give Engineer or SANGHAVI the money. From June 5, 2015, through June 10, 2015, she picked up approximately $18,000 for Engineer and SANGHAVI.

On or about November 20, 2015, M.L. of Torrington, CT fell victim to the IRS impersonation scam in a similar manner as C.L.. M.L. was instructed to send money via Green Dot cards and Western Union wire transfers. M.L. wired $4,100 to Joliza Lopez in Houston, TX.

TIGTA's Agents met with Lopez. Lopez reported that she was recruited to work for Engineer and SANGHAVI by a friend. Lopez was told people did not want to pay taxes on their money so they were using MoneyGram and Western Union to avoid taxes. She asked Engineer and SANGHAVI if this was legal and they replied yes. Engineer and SANGHAVI would drive her to various locations to pick up the money. Engineer and

SANGHAVI told her there was a $25,000 limit on the amounts of funds she could pick up. From November 9, 2015, through November 13, 2015, Lopez picked up approximately $7,595 for ENGINEER and SANGHAVI.

On May 2nd, 2017, Engineer and Kautilya Vyas were encountered by TIGTA Agents attempting to pick up another check issued under fraudulent means. On that date, Engineer and Vyas consented to a search of their phones. Agents noticed "Whatsapp" messages between SANGHAVI and Vyas asking Vyas if the package arrived; asking Vyas where Engineer was; asking Vyas to have Engineer contact SANGHAVI; telling VYAS it was urgent for Engineer to contact SANGAHVI. These communications show SANGHAVI and Engineer are still in communication on a date a fraudulent check was to be acquired. Additionally, SANGHAVI and Engineer share a shell company together which Agents have yet to find a legitimate purpose for. In 2016 SANGHAVI purchased a brand new 2016 Ford F150, King Ranch, with no legitimate employment. Engineer was arrested on May 8, 2017 attempting to leave the country via Air India flight 126 out of Chicago O'Hare airport. Engineer's native country is India. SANGHAVI's native country is also India.

Based upon the information contained in this affidavit, there is probable cause to believe BHAVDIP SANGHAVI is in violation of Title 18, USC Section 1343, Fraud by wire, radio, or television.

Jessica Cipolla
Special Agent, TIGTA

Signed and sworn to before me on May 9th, 2017, and I find probable cause.

Mary Milloy
U.S. Magistrate Judge